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Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Brandon Kotaniemi, individually and as special
co-administrator of the Estate of Marsha
Kotaniemi; Steven Kotaniemi, individually and as
special co-administrator of the Estate of Marsha
Kotaniemi,

Plaintiffs,

v.

Brian C. Ward, MD, an individual in his
official capacity; Stephanie Martinez, MD, an
individual in her official capacity; Emily
Tibbits, MD, an individual; Lisa Angotti, MD
an individual; State of Nevada ex rel The Board
of Regents of the Nevada System
of Higher Education ex rel the University of
Nevada, Las Vegas, a political subdivision;
DOE INDIVIDUALS I-X, inclusive; and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:25-cv-00540-APG-MDC

**United States' Statement Regarding
Removal**

In accordance with the court's order (ECF No. 3), the United States submits this
statement regarding removal.

1. The date on which you were served with a copy of the complaint.

As of the date of this filing, the United States has not been properly served in this
action in accordance with the Federal Rules of Civil Procedure. In addition, the United
States has not been properly served a copy of the complaint.

2. The date on which you were served with a copy of the summons.

As of the date of this filing, the United States has not been properly served in this action in accordance with the Federal Rules of Civil Procedure. In addition, the United States has not been properly served a copy of the summons.

3. In removals based on diversity of citizenship, the names of any served defendants who are citizens of Nevada, the citizenship of the other parties, and a summary of defendant's evidence of the amount in controversy.

Not applicable. The United States did not remove this case based on diversity jurisdiction.

4. If the notice of removal was filed more than 30 days after you first received a copy of the summons and complaint, the reason removal has taken place at this time and the date you first received a paper identifying the basis for removal.

Not applicable.

5. In actions removed on the basis of the court's jurisdiction in which the state court action was commenced more than a year before the date of removal, the reasons this action should not summarily be remanded to the state court.

Plaintiff commenced the state court case on February 4, 2025, less than one year before the date of removal.

6. The name of any defendant known to have been served before you filed the notice of removal who did not formally join in the notice of removal and the reasons they did not.

The United States is not aware of any defendant known to have been properly served in accordance with the Federal Rules of Civil Procedure before the United States filed its notice of removal.

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1 Finally, the court's order (ECF No. 3) instructs the removing party to serve a copy of
2 the order on all other parties to the case. In accordance with that order, a copy of order is
3 attached as an exhibit to this filing.

4 Dated: April 9, 2025

5 SIGAL CHATTAH
6 United States Attorney

7 /s/ Karissa D. Neff
8 KARISSA D. NEFF
9 Assistant United States Attorney
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Certificate of Service

I certify that on April 9, 2025, I electronically filed the foregoing Statement Regarding Removal with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system and via electronic mail and US Mail to the addresses listed below.

U.S. Mail:

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Attorney for Defendants –
Brian Ward, MD; Stephanie Martinez, MD;
State of Nevada ex rel. The Board of Regents
of the Nevada System of Higher Education
ex rel. The University of Nevada, Las Vegas

/s/ Karissa D. Neff
KARISSA D. NEFF
Assistant United States Attorney
United States Attorney's Office